

# **Begin with the End in Mind: Designing Information Systems from a Records Management Perspective**

COV Information Security Conference

August 2022



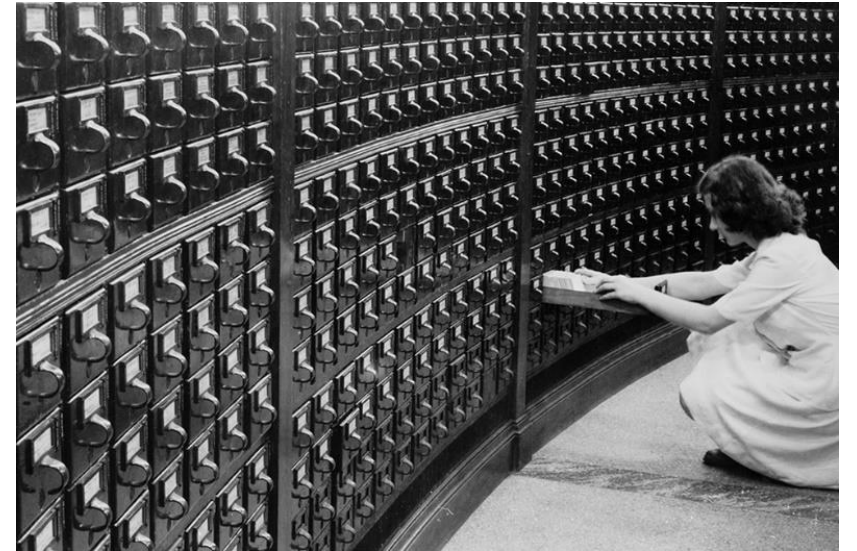
# About Me

- Records Management Analyst with Library of Virginia
- 5 Records Analysts work with every state agency and locality in the Commonwealth
- Point of contact for questions about everyday records management
- Collaborate with agencies to develop and revise records retention schedules



# Once upon a time...

- Paper records were organized in a central, controlled, and often locked environment
  - File cabinets
  - File rooms
- Everyone knew:
  - Where and how to file (or who to hand the file – the secretary or file clerk)
  - Where to retrieve files (or who to ask – the secretary or file clerk)



# Once upon a time...

- Paper records were arranged according to a filing structure/system
  - Organizing records like a grocery store
  - Numeric filing
  - Alphabetical filing



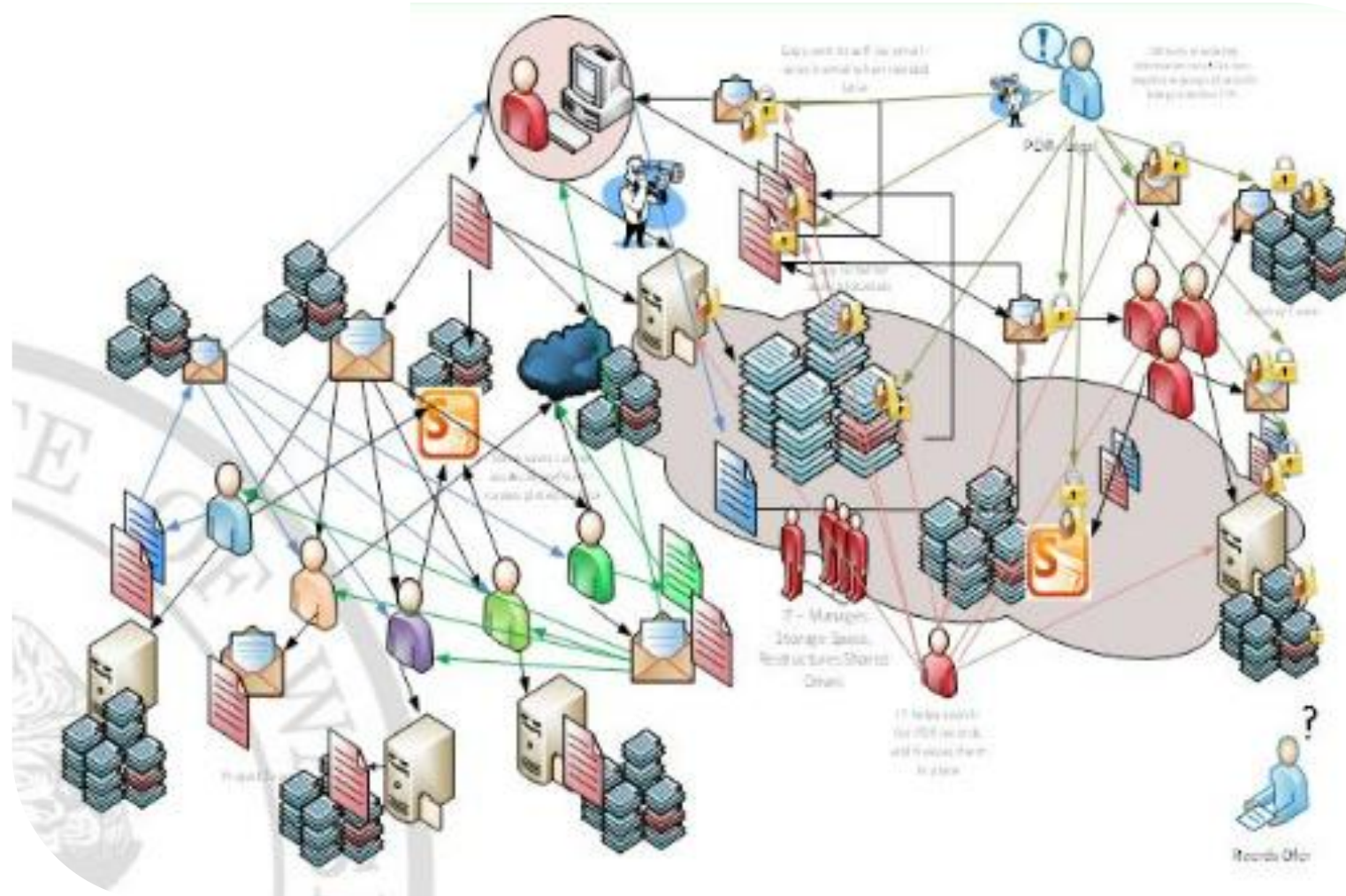


# Losing governance

- Over the last few decades, technology shifted the task of RM to end users
- Traditional file clerks went away, or stuck to their realm of paper records
- Few tools or processes in place to organize electronic records
- Little collaboration between RM and new IT departments



# Records Management today

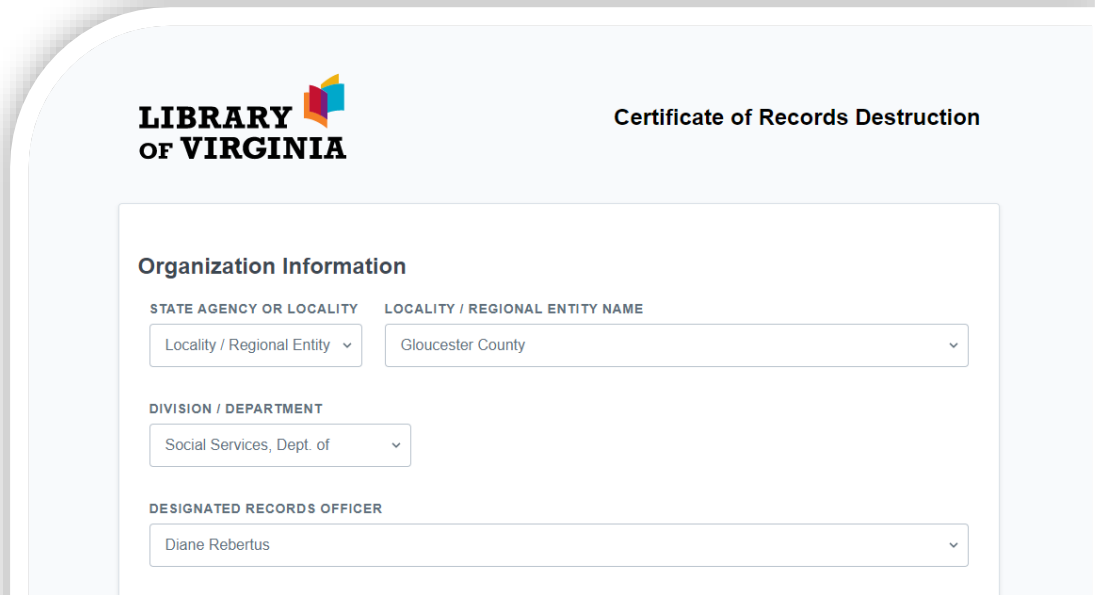


# What is records management?



# Disposition is a VERB

- Take action to destroy or transfer/archive records
- Virginia Public Records Act (§ 42.1-86.1. *Disposition of public records*)
  - Records must be destroyed in a timely manner
  - Destruction must be reported to the Library of Virginia before destruction occurs



The screenshot shows a web form titled "Certificate of Records Destruction" from the "LIBRARY OF VIRGINIA". The form is divided into sections for "Organization Information", "DIVISION / DEPARTMENT", and "DESIGNATED RECORDS OFFICER".

**Organization Information**

STATE AGENCY OR LOCALITY	LOCALITY / REGIONAL ENTITY NAME
Locality / Regional Entity ▾	Gloucester County ▾

**DIVISION / DEPARTMENT**

Social Services, Dept. of ▾
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**DESIGNATED RECORDS OFFICER**

Diane Rebertus ▾
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# What is a retention schedule?

- Legal documents approved by Records Oversight Committee
- Foundation for implementing records management
- Supports “defensible disposition”

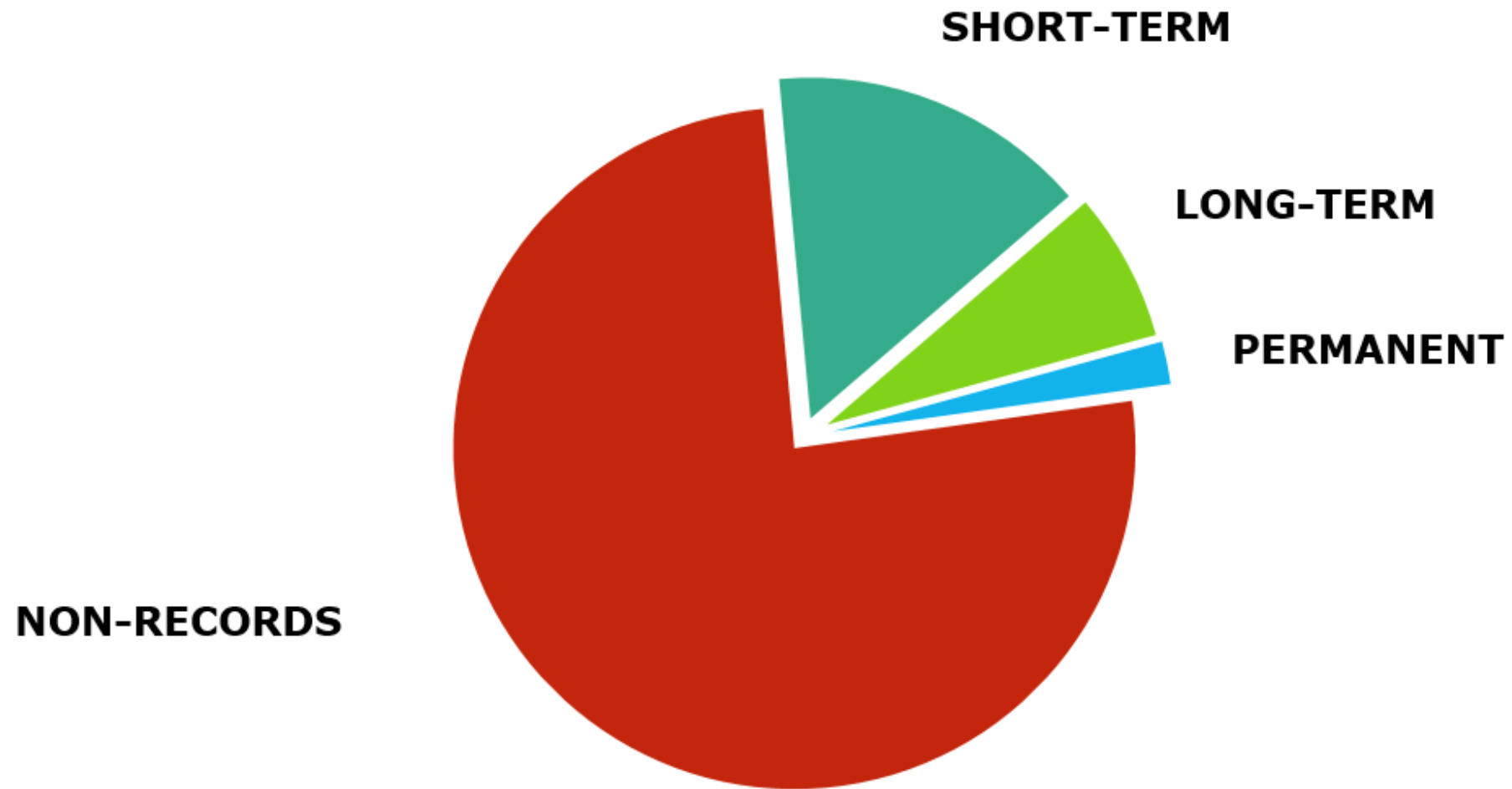
  
**LIBRARY OF VIRGINIA**  
 Archives, Records, and Collections Services  
 800 E. Broad St., Richmond VA 23219  
 (804) 692-3600

## RECORDS RETENTION AND DISPOSITION SCHEDULE GENERAL SCHEDULE NO. GS-18 COUNTY AND MUNICIPAL GOVERNMENTS Community Services Boards

EFFECTIVE SCHEDULE DATE: 4/11/2013

RECORD SERIES AND DESCRIPTION	SERIES NUMBER	SCHEDULED RETENTION PERIOD	DISPOSITION METHOD
<u>Case Files: Referred but Not Accepted as Clients</u> This series documents the screening or evaluation of possible clients who were referred but not accepted for services. This series may include, but is not limited to: summary of prescreening reports.	005621	Retain 2 Years after last action	Confidential Destruction
<u>Claims and Billing</u> This series documents requests for payments of services rendered to clients. This series may include, but is not limited to: billing information, including those for Medicare/Medicaid clients; invoices; and payments.	005610	Retain 6 Years after audit	Confidential Destruction
<u>Client Case Files: Adult</u> This series documents treatment and services provided to adult patients, both court ordered and non. This series may include, but is not limited to: authorization/consent to release form, insurance and payment information, raw data used to evaluate clients, summary of prescreening reports, counseling, emergency, medical, or treatment records. 18VAC85-20-26	005612	Retain 6 Years after last action	Confidential Destruction
<u>Client Case Files: Minor</u> This series documents treatment and services provided to minor patients, both court ordered and non. This series may include, but is not limited to: authorization/consent to release form, insurance and payment information, raw data used to evaluate clients, summary of prescreening reports, counseling, emergency, medical, or treatment records. 18VAC85-20-26	005613	Retain 24 Years after birth	Confidential Destruction
<u>Performance Contract Review</u> This series documents compliance with a CSB's approved performance contract. This series may include, but is not limited to: review of consumer and service data, audit, and financial reports, and documentation of on-site reviews.	005624	Retain 4 Years after end of state fiscal year	Confidential Destruction

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# What about electronic records?

- Retention schedules are format-neutral

*“Regardless of physical form or characteristic, the recorded information is a public record if it is produced, collected, received or retained in pursuance of law or in connection with the transaction of public business. The medium upon which such information is recorded has no bearing on the determination of whether the recording is a public record.”*

*(Va. Code § 42.1-77)*

- “Born-digital” records have METADATA that must be preserved as well



# Pre-COVID (the Before-Times)

More and more agencies:

- Moving to paperless environment
- Working on collaborative platforms
- Adopting or developing structured data systems
- Collecting bulk of data in structured data systems

Already dealing with challenges:

- Storage - mentality of “if you just put it here, we’ll deal with it later” – creates vulnerability & risk
- Access - how do you retrieve files when there is so much volume with no classification?
- Security - how do you protect sensitive information with no classification?

# COVID & Explosion of Hybrid Work

- Everything changed on a dime
- Huge catalyst for electronic records management





# The New Normal

- Step back and take stock of rapid change
- Find opportunity in disruption:
  - Rare moment when people are amenable to change
  - Build stronger information security and governance framework with representation from everyone: legal, data, cybersecurity, & RM
  - Introduce governance to data systems - classification labeling
  - Train and educate

# How can RM help?

- We are NOT the records police
- We need a seat at the table when it comes to implementing enterprise solutions – retention considerations go hand-in-hand with data governance & classification
- We help IT however possible, but especially with:
  - being the guinea pig or recruiting guinea pigs
  - change management, training, & education
  - following up with users post-implementation

# How can IT help?

- Loop us in – give RM a seat at the table
- Eliminate silos - collaboration of stakeholders (users, legal, risk, IT, and RM)
- Use standards (e.g., DoD 1515.2)
- Include RM in system requirements

## INFORMATION GOVERNANCE

- Simplicity & standardization – one blanket retention – one-size-fits-all
- IT has central control
- Proactive use of data to solve business challenges
- Integration of data to make better decisions

## RECORDS MANAGEMENT

- We ask the same questions:
  - What kind of business functions does your agency perform?
  - What kind of data do you collect and maintain to support those business functions?
  - How are you stewarding that information? Are you storing it somewhere specific? What regulations apply to it?
- We have a shared goal to help the end user
- We face change management challenges (fiercely independent agencies, hodgepodge legacy systems)
- Customization (within limits) and precision
- Give some control to agencies/end users
- Not all records are created equal – more complex retention needs (based on legal, administrative, fiscal, historical value)

# Conclusion

- Save us a seat at the table, & sit at *our* table when schedules are being revised
- RM:
  - Reduces risk and liability (financial & legal)
  - Increases access
  - Facilitates business continuity & ongoing transfer of organizational knowledge
  - Eliminates wasteful time sucks
- *The easiest information to secure is the information you don't have.*